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*Counsel for Plaintiffs*

UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

PINEROS Y CAMPESINOS UNIDOS DEL )  
 NOROESTE, UNITED FARM WORKERS, )  
 FARMWORKER ASSOCIATION OF FLORIDA, )  
 CALIFORNIA RURAL LEGAL ASSISTANCE )  
 FOUNDATION, and PESTICIDE ACTION )  
 NETWORK NORTH AMERICA, )

Plaintiffs, )

v. )

E. SCOTT PRUITT, in his official capacity as )  
 Administrator of the U.S. Environmental Protection )  
 Agency; and U.S. ENVIRONMENTAL )  
 PROTECTION AGENCY, )

Defendants. )

Case No: 4:17-cv-03434 JSW

**DECLARATION OF Ramon Ramirez IN  
 SUPPORT OF PLAINTIFFS' MOTION  
 FOR ATTORNEYS' FEES AND COSTS**

1 I, Ramon Ramirez, hereby declare as follows:

2 1. I am the President of the board of director of PCUN, one of the plaintiff organizations  
3 that brought the above-captioned case. I submit this declaration in support of Plaintiffs' Motion for  
4 Attorneys' Fees and Costs, submitted herewith. I have personal knowledge of the matters stated  
5 herein and, if called as a witness, could and would competently testify thereto.

6 2. When this lawsuit was filed in June 2017, and as of the date of this declaration,  
7 PCUN had 22 employees at the end of the year 2017. PCUN net worth at the end of 2017 was  
8 \$40,442.00. The same was true when our Ninth Circuit petitions challenging the rule delays were  
9 filed in May and July 2017.

10 3. PCUN retained Earthjustice to represent it in this litigation, because Earthjustice  
11 attorneys have demonstrated skill and distinctive knowledge in the area of environmental and  
12 administrative law.

13 4. I am familiar with Earthjustice and its attorneys and know that they have a reputation  
14 for providing excellent representation in complex environmental and administrative law cases. In  
15 my experience, no similarly qualified attorneys would have agreed to undertake this case at the  
16 EAJA statutory rate of \$196.79, which is far below prevailing market rates for legal services in  
17 California.

18 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
19 personal knowledge.

20  
21 Dated: 06/18/2018

  
\_\_\_\_\_  
Ramon Ramirez